

Osberg v. Foot Locker, Inc., et al., 07-cv-01358 (KBF) (S.D.N.Y.)

**Class's Opposition to Defendants' Motion *in Limine*
to Exclude Testimony of Christopher Maikels**

July 10, 2015

PX1277

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MMCALC (10) REG0196

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DO DOCUMENTATION (INFORMATION)

CLIENT: FWW WOOLWORTH
PROJECT: STATEMENTSCODER: C MAIKELS
TKS CODE:*Superceded*

DO DOCUMENTATION (NOTES)

CALCULATE ESTIMATED BENEFITS FOR 01/01/96 ESTIMATE REGISTER

OP MMCALC OPTIONS

DB NAME	VALUATION DATE	SS LAW DATE	SAL LIMITS LAW YEAR	EDIT DECK (BLANK, Y)	TRACE CALCS (BLANK, Y)	TRACE SS (BLANK, Y)	REC # FOR TEST	LENGTH FOR UNDEF WRKFLDS	DECIMALS FOR UNDEF WRKFLDS
CB95	1 / 1 / 95	/ /							

DATE LABELS

LINE	DATE LABEL	'<' FIELD	MONTH FIELD	DAY FIELD	YEAR FIELD
1	\$BIRTH	<	MOB	DOB	YOB ✓

Using @ statements Jdn base

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BC BENEFIT CALCULATION

LINE	GROUP FIELD	STATEMENT	AS OF DATE LABEL
1		DO SC(1)/SC(2)/SC(3)/SC(4)/SC(5)/SC(6)	
2		* GET 9% FACTOR	
3		DO TL(1)/TL(2) ✓	
4		INT1=AGENOW-AGEFLOOR ✓	
5		LS9FACT=INT1*FACTOR9B+(1-INT1)*FACTOR9A ✓	
6		* GET 6.5% FACTOR	
7		DO TL(3)/TL(4) ✓	
8		LS65FACT=INT1*FACTOR6B+(1-INT1)*FACTOR6A ✓	
9		* GET 6.5% IMMEDIATE FACTOR	
10		DO TL(5)/TL(6) ✓	
11		IMM1196=INT1*FACTOR6D+(1-INT1)*FACTOR6C ✓	
12		* GET ENHANCED CB ER FACTOR	
13		ER2=VESTSVC+1.GE.15.AND.YOB.LT.46 ✓	
14		ERF=1 ✓	
15	ER2	ERF=(1-((65-AGENOW)*.04))>.6 ✓	
16		* CASH BALANCE & MIN LUMP SUM	
17		CB123195=ACCBEN94*LS9FACT/ERF ✓	
18		PV123195=ACCBEN94*LS65FACT ✓	
19		*	
20		* GET ER FACTOR AT 1/1/96	
21		ER3=VESTSVC+1.GE.15 ✓	
22		ER1196=(1-((65-AGENOW)*.06))>.4 ✓	
23	ER3	ER1196=(1-((65-AGENOW)*.04))>.6 ✓	
24		* GET BENEFIT AMOUNTS	
25		AGENOWLS=CB123195>PV123195 ✓	
26		SLA65=ACCBEN94 ✓	
27		JS6550ST=SLA65*.91 ✓	
28		JS6575ST=SLA65*.87 ✓	
29		JS6500ST=SLA65*.83 ✓	
30		CL6560=SLA65*.98 ✓	
31		CL65120=SLA65*.94 ✓	
32		* GET IMMEDIATE BENEFITS (AT OR OVER 55)	
33		SLANOW=SLA65*ER1196 ✓	
34		JSNOW50=SLANOW*.91 ✓	
35		JSNOW75=SLANOW*.87 ✓	
36		JSNOW100=SLANOW*.83 ✓	
37		CLNOW60=SLANOW*.98 ✓	
38		CLNOW120=SLANOW*.94 ✓	
39		* GET IMMEDIATE BENEFITS (UNDER 55)	
40	UNDER	UNDER=YOB.GE.42 ✓	
41	UNDER	SLAIMM=CB123195/IMM1196 ✓	
42		JS50IMM=SLAIMM*.91 ✓	
43		*	
44		MIN65LS=AC123195*10.24675	
45		CB65LS=CB123195*((1.06)**(65-AGENOW)) not used	
46		AGE65LS=CB65LS>MIN65LS	

Vest SVC is as of 1-1-95

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SC SERVICE CALCULATION

LINE	RESULT FIELDS			DATE LABEL	DATE	SERVICE	TYPE SRVC	RNDG CODE	MAX YRS OF SRVC
	DECIMAL	YRS	YEARS						
1	AGEFLOOR			1) \$BIRTH	1 / 1 / 1996 ✓			3 ✓	
2	AGEPLUS1			2) \$BIRTH	/ /			3 ✓	
3	AGENOW			1) \$BIRTH	1 / 1 / 1996 ✓			2 ✓	
4	AGE2196			2) \$BIRTH	/ /			2	
5	AGFL2196			1) \$BIRTH	2 / 1 / 1996			3	
6	AGPL2196			2) \$BIRTH	/ /			3	
				1) \$BIRTH	2 / 1 / 1997				
				2) \$BIRTH	/ /				

1 TABLE LOOKUP

LINE	RESULT FIELD	TABLE NAME	TABLE TYPE	LOOKUP FIELD
1	FACTOR9A	GATT900	1	AGEFLOOR ✓
2	FACTOR9B	GATT900	1	AGEPLUS1 ✓
3	FACTOR6A	GATT650	1	AGEFLOOR ✓
4	FACTOR6B	GATT650	1	AGEPLUS1 ✓
5	FACTOR6C	GATTIMM	1	AGEFLOOR ✓
6	FACTOR6D	GATTIMM	1	AGEPLUS1 ✓

CONTROL TOTALS

SCREEN	LINES	TOTAL
DO	1	-97.
DO	1	-4092.
OP	1	2479.
DL	1	-3193.
BC	46	-39252849.
SC	6	456059.
T	6	101727.
TOTAL	62	-38699966.

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MMCALC	DATE: 11/21/95	TIME: 12:49:41	PAGE 1				
	EXACT TL:GATT900	EXACT TL:GATT900	EXACT TL:GATT650				
21.000000	0.174 21.000000	0.174 21.000000	0.575 81.000000	5.361 81.000000	5.361 81.000000	5.959	
22.000000	0.189 22.000000	0.189 22.000000	0.612 82.000000	5.157 82.000000	5.157 82.000000	5.710	
23.000000	0.207 23.000000	0.207 23.000000	0.652 83.000000	4.957 83.000000	4.957 83.000000	5.466	
24.000000	0.225 24.000000	0.225 24.000000	0.695 84.000000	4.761 84.000000	4.761 84.000000	5.229	
25.000000	0.246 25.000000	0.246 25.000000	0.740 85.000000	4.567 85.000000	4.567 85.000000	4.997	
26.000000	0.268 26.000000	0.268 26.000000	0.788 86.000000	4.376 86.000000	4.376 86.000000	4.769	
27.000000	0.292 27.000000	0.292 27.000000	0.840 87.000000	4.187 87.000000	4.187 87.000000	4.546	
28.000000	0.318 28.000000	0.318 28.000000	0.895 88.000000	4.001 88.000000	4.001 88.000000	4.327	
29.000000	0.347 29.000000	0.347 29.000000	0.954 89.000000	3.816 89.000000	3.816 89.000000	4.113	
30.000000	0.379 30.000000	0.379 30.000000	1.016 90.000000	3.636 90.000000	3.636 90.000000	3.904	
31.000000	0.413 31.000000	0.413 31.000000	1.083				
32.000000	0.450 32.000000	0.450 32.000000	1.154				
33.000000	0.491 33.000000	0.491 33.000000	1.229				
34.000000	0.535 34.000000	0.535 34.000000	1.310				
35.000000	0.584 35.000000	0.584 35.000000	1.396				
36.000000	0.637 36.000000	0.637 36.000000	1.488				
37.000000	0.695 37.000000	0.695 37.000000	1.585				
38.000000	0.758 38.000000	0.758 38.000000	1.690				
39.000000	0.827 39.000000	0.827 39.000000	1.801				
40.000000	0.902 40.000000	0.902 40.000000	1.920				
41.000000	0.984 41.000000	0.984 41.000000	2.046				
42.000000	1.074 42.000000	1.074 42.000000	2.182				
43.000000	1.172 43.000000	1.172 43.000000	2.326				
44.000000	1.279 44.000000	1.279 44.000000	2.481				
45.000000	1.396 45.000000	1.396 45.000000	2.646				
46.000000	1.524 46.000000	1.524 46.000000	2.822				
47.000000	1.664 47.000000	1.664 47.000000	3.011				
48.000000	1.818 48.000000	1.818 48.000000	3.213				
49.000000	1.986 49.000000	1.986 49.000000	3.430				
50.000000	2.170 50.000000	2.170 50.000000	3.662				
51.000000	2.372 51.000000	2.372 51.000000	3.911				
52.000000	2.593 52.000000	2.593 52.000000	4.177				
53.000000	2.836 53.000000	2.836 53.000000	4.464				
54.000000	3.102 54.000000	3.102 54.000000	4.772				
55.000000	3.395 55.000000	3.395 55.000000	5.102				
56.000000	3.717 56.000000	3.717 56.000000	5.457				
57.000000	4.071 57.000000	4.071 57.000000	5.840				
58.000000	4.460 58.000000	4.460 58.000000	6.251				
59.000000	4.888 59.000000	4.888 59.000000	6.695				
60.000000	5.361 60.000000	5.361 60.000000	7.174				
61.000000	5.883 61.000000	5.883 61.000000	7.692				
62.000000	6.460 62.000000	6.460 62.000000	8.253				
63.000000	7.100 63.000000	7.100 63.000000	8.861				
64.000000	7.810 64.000000	7.810 64.000000	9.524				
65.000000	8.600 65.000000	8.600 65.000000	10.247				
66.000000	8.425 66.000000	8.425 66.000000	9.996				
67.000000	8.245 67.000000	8.245 67.000000	9.740				
68.000000	8.060 68.000000	8.060 68.000000	9.479				
69.000000	7.870 69.000000	7.870 69.000000	9.215				
70.000000	7.675 70.000000	7.675 70.000000	8.947				
71.000000	7.475 71.000000	7.475 71.000000	8.675				
72.000000	7.271 72.000000	7.271 72.000000	8.401				
73.000000	7.063 73.000000	7.063 73.000000	8.124				
74.000000	6.851 74.000000	6.851 74.000000	7.846				
75.000000	6.637 75.000000	6.637 75.000000	7.568				
76.000000	6.422 76.000000	6.422 76.000000	7.290				
77.000000	6.206 77.000000	6.206 77.000000	7.015				
78.000000	5.991 78.000000	5.991 78.000000	6.744				
79.000000	5.778 79.000000	5.778 79.000000	6.477				
80.000000	5.568 80.000000	5.568 80.000000	6.215				

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	EXACT TL:GATT650	EXACT TL:GATTIMM	EXACT TL:GATTIMM				
21.000000	0.575 21.000000	15.356 21.000000	15.356 81.000000	5.959 81.000000	5.959 81.000000	5.959	
22.000000	0.612 22.000000	15.324 22.000000	15.324 82.000000	5.710 82.000000	5.710 82.000000	5.710	
23.000000	0.652 23.000000	15.289 23.000000	15.289 83.000000	5.466 83.000000	5.446 83.000000	5.446	
24.000000	0.695 24.000000	15.253 24.000000	15.253 84.000000	5.229 84.000000	5.229 84.000000	5.229	
25.000000	0.740 25.000000	15.215 25.000000	15.215 85.000000	4.997 85.000000	4.997 85.000000	4.997	
26.000000	0.788 26.000000	15.174 26.000000	15.174 86.000000	4.769 86.000000	4.769 86.000000	4.769	
27.000000	0.840 27.000000	15.131 27.000000	15.131 87.000000	4.546 87.000000	4.546 87.000000	4.546	
28.000000	0.895 28.000000	15.086 28.000000	15.086 88.000000	4.327 88.000000	4.327 88.000000	4.327	
29.000000	0.954 29.000000	15.038 29.000000	15.038 89.000000	4.113 89.000000	4.113 89.000000	4.113	
30.000000	1.016 30.000000	14.987 30.000000	14.987 90.000000	3.904 90.000000	3.904 90.000000	3.904	
31.000000	1.083 31.000000	14.933 31.000000	14.933				
32.000000	1.154 32.000000	14.876 32.000000	14.876				
33.000000	1.229 33.000000	14.816 33.000000	14.816				
34.000000	1.310 34.000000	14.753 34.000000	14.753				
35.000000	1.396 35.000000	14.686 35.000000	14.686				
36.000000	1.488 36.000000	14.615 36.000000	14.615				
37.000000	1.585 37.000000	14.540 37.000000	14.540				
38.000000	1.690 38.000000	14.461 38.000000	14.461				
39.000000	1.801 39.000000	14.378 39.000000	14.378				
40.000000	1.920 40.000000	14.290 40.000000	14.290				
41.000000	2.046 41.000000	14.198 41.000000	14.198				
42.000000	2.182 42.000000	14.101 42.000000	14.101				
43.000000	2.326 43.000000	13.999 43.000000	13.999				
44.000000	2.481 44.000000	13.892 44.000000	13.892				
45.000000	2.646 45.000000	13.780 45.000000	13.780				
46.000000	2.822 46.000000	13.663 46.000000	13.663				
47.000000	3.011 47.000000	13.541 47.000000	13.541				
48.000000	3.213 48.000000	13.414 48.000000	13.414				
49.000000	3.430 49.000000	13.282 49.000000	13.282				
50.000000	3.662 50.000000	13.144 50.000000	13.144				
51.000000	3.911 51.000000	13.000 51.000000	13.000				
52.000000	4.177 52.000000	12.851 52.000000	12.851				
53.000000	4.464 53.000000	12.695 53.000000	12.695				
54.000000	4.772 54.000000	12.533 54.000000	12.533				
55.000000	5.102 55.000000	12.363 55.000000	12.363				
56.000000	5.457 56.000000	12.186 56.000000	12.186				
57.000000	5.840 57.000000	12.002 57.000000	12.002				
58.000000	6.251 58.000000	11.810 58.000000	11.810				
59.000000	6.695 59.000000	11.609 59.000000	11.609				
60.000000	7.174 60.000000	11.401 60.000000	11.401				
61.000000	7.692 61.000000	11.185 61.000000	11.185				
62.000000	8.253 62.000000	10.961 62.000000	10.961				
63.000000	8.861 63.000000	10.730 63.000000	10.730				
64.000000	9.524 64.000000	10.492 64.000000	10.492				
65.000000	10.247 65.000000	10.247 65.000000	10.247				
66.000000	9.996 66.000000	9.996 66.000000	9.996				
67.000000	9.740 67.000000	9.740 67.000000	9.740				
68.000000	9.479 68.000000	9.479 68.000000	9.479				
69.000000	9.215 69.000000	9.215 69.000000	9.215				
70.000000	8.947 70.000000	8.947 70.000000	8.947				
71.000000	8.675 71.000000	8.675 71.000000	8.675				
72.000000	8.401 72.000000	8.401 72.000000	8.401				
73.000000	8.124 73.000000	8.124 73.000000	8.124				
74.000000	7.846 74.000000	7.846 74.000000	7.846				
75.000000	7.568 75.000000	7.568 75.000000	7.568				
76.000000	7.290 76.000000	7.290 76.000000	7.290				
77.000000	7.015 77.000000	7.015 77.000000	7.015				
78.000000	6.744 78.000000	6.744 78.000000	6.744				
79.000000	6.477 79.000000	6.477 79.000000	6.477				
80.000000	6.215 80.000000	6.215 80.000000	6.215				

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DICTIONARY OF FIELDS IN '\$WRK'-

	FIELD NAME	LENGTH	TYPE	DEC	DESCRIPTION
109	\$BIRTH	8	N	0	DATE LABEL
110	AGEFLLOOR	9	N	6	RESULT FIELD
111	AGEPLUS1	9	N	6	RESULT FIELD
112	AGENOW	9	N	6	RESULT FIELD
113	AGE2196	9	N	6	RESULT FIELD
114	AGFL2196	9	N	6	RESULT FIELD
115	AGPL2196	9	N	6	RESULT FIELD
116	FACTOR9A	9	N	3	RESULT FIELD
117	FACTOR9B	9	N	3	RESULT FIELD
118	FACTOR6A	9	N	3	RESULT FIELD
119	FACTOR6B	9	N	3	RESULT FIELD
120	FACTOR6C	9	N	3	RESULT FIELD
121	FACTOR6D	9	N	3	RESULT FIELD
122	INT1	9	N	3	RESULT FIELD
123	LS9FACT	9	N	3	RESULT FIELD
124	LS65FCT	9	N	3	RESULT FIELD
125	IMM1196	9	N	3	RESULT FIELD
126	ER2	1	N	0	RESULT FIELD
127	ER3	1	N	0	RESULT FIELD
128	UNDER	1	N	0	RESULT FIELD
129	MIN65LS	9	N	3	RESULT FIELD
130	AC123195	9	N	3	OPERAND
131	CB65LS	9	N	3	RESULT FIELD
132	AGE65LS	9	N	3	RESULT FIELD

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19346 RECORDS PROCESSED

BC LINE # NUMBER PROCESSED NUMBER OVERFLOWS

1	19346	0
3	19346	
4	19346	0
5	19346	
7	19346	0
8	19346	
10	19346	0
11	19346	
13	19346	0
14	19346	
15	2095	0
17	19346	0
18	19346	
21	19346	0
22	19346	0
23	4337	0
25	19346	
26	19346	0
27	19346	0
28	19346	
29	19346	0
30	19346	
31	19346	0
33	19346	
34	19346	0
35	19346	
36	19346	0
37	19346	
38	19346	0
40	19346	
41	16492	
42	16492	
44	19346	
45	19346	0
46	19346	1

*** CHECK 1 OVERFLOWS ***

MercerFL0002308